

The Commonwealth of Massachusetts

Office of Campaign & Political Finance

One Ashburton Place, Boston 02108

727-8352

AO-14

*Dennis J. Duffin
Director*

September 10, 1982

Martin M. Norman, Ph. D.
Chairperson, Steering Committee
Massachusetts Psychological
Political Action Committee
14 Beacon Street, Suite 704B
Boston, MA 02108

Dear Dr. Norman:

Thank you for your letter of September 1, 1982 in which you seek my opinion on two matters. First, whether political contributions of a Massachusetts PAC are restricted to Massachusetts candidates so that financial support of candidates for national office would require establishing a separate Federal PAC. And secondly, is it permissible for you, under state regulations to endorse candidates for national office without contributing to their campaigns, and if so, are you allowed incidental expenses relative to such endorsements?

M.G.L. c. 55, section 1 defines a political committee, in relevant part, as "any committee, association, organization or other group of persons, including a national, regional, state, county or municipal committee, which receives contributions or makes expenditures for the purpose of influencing the nomination or election of a candidate, or candidates..." As such, the Massachusetts Psychological Political Action Committee is thus subject to the provisions of M.G.L. c. 55.

Section 6 regulates what political committees may contribute to each other. While it restricts a political committee organized on behalf of a statewide candidate from contributing to any other political committee, it clearly states that "Any other political committee, duly organized, may receive, pay and expend money or other things of value for the enhancement of the political future of the candidate or the principle, for which the committee was organized... and provided, further, that such committee may contribute to other political committees..." This section further restricts the amounts that a political committee organized on behalf of a candidate may give to another such political committee, but does not restrict the amounts that multi-candidate committees may contribute to political committees.

Martin M. Norman, Ph. D.
September 10, 1982
Page 2

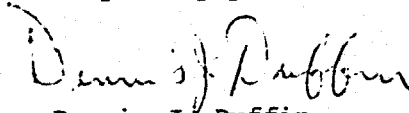
Pursuant to the above, it is my opinion that M.G.L. c. 55 does not prohibit the Massachusetts Psychological Political Action Committee from making contributions to candidates for national office, provided that such contributions are consistent with the stated purposes of your political committee. Such contributions are regulated by c. 55 in the same manner as contributions to Massachusetts political committees, and are thus subject to all requirements of c. 55.

In light of this conclusion, it is, of course, permissible for you to endorse candidates for national office and expend money for incidental purposes.

While Massachusetts law does not prohibit the above activity, federal election campaign laws, or those of other states, may affect such activity. I therefore urge that you contact the Federal Election Commission and other appropriate authorities to determine if this activity is regulated by federal law or other state laws.

If I can be of any further assistance, please do not hesitate to contact me.

Very truly yours,


Dennis J. Duffin
Director

DJD/rep